

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TYLER BAKER and LAUREN WOLF,
individually and on behalf of all others similarly
situated,

Plaintiff,

v.

ANGEION GROUP LLC,
EPIQ SYSTEMS, INC.,
JND LEGAL ADMINISTRATION,
TREMENDOUS LLC, BLACKHAWK
NETWORK HOLDINGS, INC., DIGITAL
SETTLEMENT TECHNOLOGIES LLC dba
DIGITAL DISBURSEMENTS PAYMENTS,
HUNTINGTON NATIONAL BANK,
WESTERN ALLIANCE BANK, and DOES 1-
20,

Defendants.

Case No. 2:25-cv-02079-KBH

STIPULATION AND ORDER

WHEREAS, on April 24, 2025, Plaintiff Tyler Baker filed a Complaint against Defendants Angeion Group LLC (“Angeion”), Epiq Systems, Inc. (“Epiq”), and JND Legal Administration (“JND”) [ECF No. 1];

WHEREAS, on June 13, 2025, Plaintiff filed a First Amended Complaint (“FAC”) [ECF No. 27] adding an additional Named Plaintiff (Lauren Wolf); six new claims (including alleged violations of Section 1 of the Sherman Act and Sections 1962(c) and 1962(d) of the Racketeer Influenced and Corrupt Organization Act); and five new Defendants (Tremendous LLC, Blackhawk Network Holdings, Inc., Digital Settlement Technologies LLC, The Huntington National Bank, and Western Alliance Bank) (collectively, with Angeion, Epiq, and JND, “Defendants”);

WHEREAS, Defendants’ deadline to answer, move to dismiss, or otherwise respond to the FAC is September 5, 2025 [ECF No. 46] (collectively, “Defendants’ Response Deadlines”);

WHEREAS, the Rule 16 Case Management Conference has not yet been set, and discovery has not yet begun;

WHEREAS, other lawsuits have been filed in other jurisdictions that involve overlapping allegations against at least some Defendants. *See Whalen, et al., v. Epiq Systems, Inc., et al.*, No. 3:25-cv-4522 (N.D. Cal.) (filed May 28, 2025); (2) *Whalen v. Epiq Systems Inc., et al.*, No. 25-cv-4499 (S.D.N.Y.) (filed May 29, 2025); (3) *Tejon v. Epiq Systems, Inc., et al.*, No. 25-cv-22453 (S.D. Fla.) (filed May 29, 2025); and (4) *Rieger v. Epiq Systems, Inc., et al.*, No. 3:25-cv-4793 (N.D. Cal.) (filed June 5, 2025) (together, the “Related Actions”);

WHEREAS, on August 13, 2025, Plaintiffs Tyler Baker and Lauren Wolf (“Plaintiffs”) filed a motion before the Judicial Panel on Multidistrict Litigation (“JPML”) pursuant to 28 U.S.C. § 1407 and Rule 7.2 of the Rules of Procedure of the JPML, to transfer and centralize the Related Actions to this Court before the undersigned Judge or, alternatively, to the U.S. District Court for the Southern District of New York for consolidated or coordinated pretrial proceedings (“JPML Motion”);

WHEREAS, judicial economy is served by staying matters pending the resolution of a motion before the JPML. *See Sullivan v. Meta Platforms, Inc.*, Case No. 25-0456 (E.D. Pa. May 29, 2025) (Hodge, J.), ECF No. 34 at 2 n.1 (“It would be a waste of judicial resources for this Court to consider the merits of the motions in this action while the JPML is considering whether transfer and centralization is appropriate.”); *Kane v. McGraw-Hill Companies, Inc.*, No. 13-605, 2013 WL 1397434, at *4 (M.D. Pa. Apr. 5, 2013) (“Courts often stay proceedings pending action by the JPML to preserve judicial resources and to ensure consistency in the disposition of like

matters.”); *Deoleo v. United States Liability Ins. Co.*, No. 20-2301, 2020 WL 9763085, at *1 (E.D. Pa. July 14, 2020) (granting motion to stay pending JPML ruling because “[a] short stay may avoid unnecessary briefing on Defendant’s anticipated Motion to Dismiss”);

WHEREAS, Plaintiffs and Defendants have conferred and agree that judicial economy and the interests of justice would be served by staying the above-captioned case pending the JPML’s decision on Plaintiffs’ pending JPML Motion;

NOW THEREFORE, it is hereby STIPULATED AND AGREED, that:

1. All outstanding deadlines in the above-captioned case, including Defendants’ deadline to answer, move to dismiss, or otherwise respond to the FAC, are stayed pending the JPML’s decision on Plaintiffs’ JPML Motion.
2. If the JPML grants Plaintiffs’ JPML Motion, and the matter is consolidated before this Court, Defendants will have fifty (50) days after the filing of a consolidated complaint to answer or otherwise respond to the consolidated complaint.
3. If the JPML denies Plaintiffs’ JPML Motion, Defendants’ will have thirty-five (35) days from the date of the JPML’s order denying the motion to respond to the FAC.

IT IS SO ORDERED.

Dated: August 20 , 2025

/s/ Hon. Kelley B. Hodge
Hon. Kelley Brisbon Hodge
U.S.D.J.

/s/ Shauna Itri

Shauna Itri
SEEGER WEISS LLP
325 Chestnut Street
Suite 917
Philadelphia, PA 19106
267-973-4265
sitri@seegerweiss.com

Christopher A. Seeger
SEEGER WEISS LLP
55 Challenger Road, 6th Floor
Ridgefield Park, NJ 07660
212-584-0700
cseeger@seegerweiss.com

Marc H. Edelson
Eric Lechtzin
EDELSON LECHTZIN LLP
411 S. State Street
Ste N-300
Newtown, PA 18940
215-867-2399
medelson@edelson-law.com
elechtzin@edelson-law.com

Attorneys for Plaintiffs

/s/ J. Gordon Cooney, Jr.

J. Gordon Cooney, Jr.
Franco A. Corrado
Matthew D. Klayman
MORGAN, LEWIS & BOCKIUS LLP
2222 Market Street
Philadelphia, PA 19103
215-963-5000
jgcooney@morganlewis.com
franco.corrado@morganlewis.com
matthew.klayman@morganlewis.com

Attorneys for Defendant Angeion Group LLC

/s/ Sozi Tulante

Sozi Pedro Tulante
Clare Putnam Pozos
Steven E. Bizar
Craig J. Castiglia
Thomas J. Miller
DECHERT LLP
Cira Centre
2929 Arch Street
Philadelphia, PA 19104
215-994-2450
sozi.tulante@dechert.com
clare.pozos@dechert.com
steven.bizar@dechert.com
craig.castiglia@dechert.com
thomas.miller@dechert.com

Benjamin E. Rosenberg (*pro hac vice*)
DECHERT LLP
1095 Avenue of the Americas
New York, NY 10036
212-698-3622
benjamin.rosenberg@dechert.com

*Attorneys for Defendant JND Legal
Administration*

/s/ Greg Silbert

Greg Silbert
David Lender
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153-0119
212-310-8000
gregory.silbert@weil.com
david.lender@weil.com

*Attorneys for Defendant Blackhawk Network
Holdings, Inc.*

/s/ Matthew Aaron Goldberg

Matthew Aaron Goldberg
Brett M. Feldman
Nathan P. Heller
Rachel Katherine Mudra
DLA PIPER LLP (US)
One Liberty Place
1650 Market Street
Suite 5000
Philadelphia, PA 19103
215-656-3377
matthew.goldberg@us.dlapiper.com
brett.feldman@us.dlapiper.com
nathan.heller@us.dlapiper.com
rachel.mudra@us.dlapiper.com

Attorneys for Defendant Epiq Systems, Inc.

/s/ Andrew J. Soven

Andrew J. Soven
POL SINELLI PC
PA Attorney No. 76766
1717 Arch Street, Suite 2800
Philadelphia, PA 19103
(215) 267-3018
asoven@polsinelli.com

Brendan P. Cullen (*pro hac vice*)
Kyle W. Mach (*pro hac vice*)
Paul H. Lazarow (*pro hac vice*)
SULLIVAN & CROMWELL LLP
550 Hamilton Avenue
Palo Alto, California 94301
(650) 461-5600
(650) 461-5700
cullenb@sullcrom.com
machk@sullcrom.com
lazarowp@sullcrom.com

*Attorneys for Defendant Western Alliance
Bank and Digital Settlement Technologies
LLC*

/s/ Paul H. Saint-Antoine

Paul H. Saint-Antoine (Pa. Id. 56224)
**FAEGRE DRINKER BIDDLE & REATH
LLP**
One Logan Square, Suite 2000
Telephone: (215) 988-2700
Facsimile: (215) 988-2757
Paul.Saint-Antoine@faegredrinker.com

Amanda L. Groves (*pro hac vice*)
WINSTON & STRAWN LLP
333 South Grand Avenue
Los Angeles, CA 90071
Telephone: (213) 615-1700
Facsimile: (213) 615-1750
AGroves@winston.com

Jeffrey L. Kessler (*pro hac vice*)
George E. Mastoris (*pro hac vice*)
WINSTON & STRAWN LLP
200 Park Avenue
New York, New York 10166
Telephone: (212) 294-6700
Facsimile: (212) 294-4700
JKessler@winston.com
GMastoris@winston.com

Lauren E. Duxstad (*pro hac vice*)
WINSTON & STRAWN LLP
200 S. Biscayne Boulevard, Suite 2400
Miami, Florida 33131
Telephone: (305) 910-0500
Facsimile: (305) 910-0505
LDuxstad@winston.com

*Attorneys for Defendant The Huntington
National Bank*

/s/ Stuart A. Williams

Stuart A. Williams (Pa. Id. 28063)
**WILSON SONSINI GOODRICH &
ROSATI, Professional Corporation**
1301 Avenue of the Americas, 40th Floor
New York, NY 10019
Telephone: (212) 999-5800
Facsimile: (866) 974-7329
SWilliams@wsgr.com

Jess M. Krannich (*pro hac vice forthcoming*)
Paul J. Sampson (*pro hac vice forthcoming*)
W. Bradford Barber (*pro hac vice
forthcoming*)
Rebecca J. Nelson (*pro hac vice forthcoming*)
**WILSON SONSINI GOODRICH &
ROSATI, Professional Corporation**
95 South State Street, Suite 100
Salt Lake City, Utah 84111
Telephone: (801) 401-8510
Facsimile: (866) 974-7329
JKrannich@wsgr.com
PSampson@wsgr.com
BBarber@wsgr.com
RNelson@wsgr.com

Attorneys for Defendant Tremendous LLC